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**PROPOSED COUNSEL FOR BEHROOZ P. VIDA,
CHAPTER 7 TRUSTEE**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FT. WORTH DIVISION**

In re:

JULREY CAESAR G. SOLIS,

Debtor.

**Case No. 24-43456-elm7
Chapter 7**

**TRUSTEE'S APPLICATION PURSUANT TO 11 U.S.C. § 327(a)
TO EMPLOY DORE ROTHBERG LAW AS GENERAL BANKRUPTCY COUNSEL**

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN RESPONSE OR OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF, UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH AN OBJECTION. IF NO OBJECTION IS TIMELY FILED AND SERVED, THIS APPLICATION SHALL BE DEEMED UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING, UNLESS THE COURT DETERMINES THAT A HEARING IS NOT REQUIRED AND THAT THE COURT'S DECISION WOULD NOT BE SIGNIFICANTLY AIDED BY ORAL ARGUMENT. IF AN OBJECTING PARTY FAILS TO APPEAR AT A SCHEDULED HEARING, ITS OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Behrooz P. Vida, in his capacity as Chapter 7 Trustee (the “Trustee”), files this *Trustee’s Application Pursuant to 11 U.S.C. § 327(a) to Employ Doré Rothberg Law, P.C. as Adversary Bankruptcy Counsel* (the “Application”). In support, the Trustee would show the Court as follows:

I. JURISDICTION AND VENUE

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This Application constitutes a core proceeding under 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are 11 U.S.C. § 327 and FED. R. BANKR. P. 2014 and 2016.

II. BACKGROUND

3. On September 26, 2024 (the “Petition Date”), Julrey Caesar G. Solis (the “Debtor”) filed a voluntary petition under Title 11, Chapter 7, United States Code (the “Bankruptcy Code”).

4. Behrooz P. Vida has been appointed Chapter 7 trustee.

III. RELIEF REQUESTED

5. By this Application, the Trustee seeks authorization to employ and retain Doré Rothberg Law, P.C. (“DRL”) as adversary bankruptcy counsel in this bankruptcy case.

6. DRL is a law firm comprised of duly-licensed attorneys with offices located at 16225 Park Ten Place, Suite 700, Houston, Texas, 77084, and 6300 Ridglea Place, Suite 617, Fort Worth, Texas, 76116. The Trustee believes that employment and retention of DRL as set forth herein is in the best interests of the estate.

7. The Trustee has selected DRL because of its extensive experience in bankruptcy matters. DRL and its attorneys are well-qualified to advise and counsel the Trustee regarding his

duties, powers and responsibilities in this bankruptcy case, and they are capable of effectively and efficiently dealing with any potential issues that may arise in connection with this bankruptcy case.

8. The Trustee seeks to retain DRL on an hourly basis. Michael Gilmore will be primarily responsible for DRL's representation of the Trustee in this case. Mr. Gilmore's current hourly rate is \$365.00 per hour. The time devoted by DRL's other attorneys and paralegals is currently charged at a rate of \$305.00–\$425.00 and \$175.00 per hour, respectively. DRL adjusts its hourly rates on an annual basis, and these rates are subject to change at the time of such annual adjustments.

9. Subject to this Court's approval, and in accordance with § 330(a), compensation will be payable to DRL on an hourly basis. Such compensation will be paid out of property of the estate from time to time and shall be computed based upon the hourly rates of the particular attorneys and paralegals who work on the case.

10. In addition, DRL will be reimbursed for the actual, necessary expenses incurred in representing the Trustee in this case using property of the estate for, *inter alia*, all reasonable travel costs, long distance calls, express mail, special or hand deliveries, outside copying costs, document processing, Westlaw fees, court fees, transcript costs, and other ordinary and extraordinary expenses.

11. To the best of its knowledge and belief, DRL has no material relationships that would raise a potentially disqualifying conflict of interest or that would otherwise render DRL ineligible to serve as counsel for the Trustee under § 327 of the Bankruptcy Code. To the best of its knowledge and belief, DRL has complied with the requirements of § 327 of the Bankruptcy Code and FED. R. BANKR. P. 2014 and 2016 with respect to this Application. Such compliance is

set forth in detail in the *Affidavit of Michael Gilmore* (the “Affidavit”) attached hereto as Exhibit A and incorporated herein by reference.

12. DRL has conducted a conflict check and is not aware of any conflicts of interest or potential conflicts of interest in representing the Trustee. DRL believes that no conflicts of interest or other disqualifying circumstances exist. To the best of its knowledge and belief, DRL is a “disinterested person,” as that term is defined in 11 U.S.C. §§ 101(14) and 327.

13. DRL and the Trustee would respectfully submit that no reason exists to deny the Trustee’s employment and retention of DRL effective as of December 16, 2024. Accordingly, DRL and the Trustee request that the Court approve the Trustee’s employment and retention of DRL as set forth herein.

IV. PRAYER

BASED ON THE FOREGOING, the Trustee respectfully requests that the Court (i) grant this Application, (ii) authorize the Trustee to employ and retain DRL as set forth herein and (iii) award the Trustee such other and further relief to which he is justly entitled.

DATED: February 12, 2025.

Respectfully submitted,

DORÉ ROTHBERG LAW, P.C.

By: /s/ Michael Gilmore

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**PROPOSED COUNSEL FOR BEHROOZ P. VIDA,
CHAPTER 7 TRUSTEE**

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2025, a true and correct copy of the foregoing document was served either electronically by the Clerk of Court or via first class United States Mail upon all parties listed in the attached service list.

/s/ Michael Gilmore

Michael Gilmore